
From: Keith Raniere <[REDACTED]>
Sent: Wednesday, December 21, 2016 10:29 PM
To: Clare Bronfman
Subject: Re: Fwd: Notice of Gift

I don't have the money yet to make this gift... I won't even be able to assess that for a while... but Pam had a desire to make this gift which can be done from her estate or something like that...

On Wednesday, December 21, 2016 4:30 PM, Clare Bronfman <[REDACTED]> wrote:

Begin forwarded message:

From: John Sandweg <[REDACTED]>
Subject: Fwd: Notice of Gift
Date: December 21, 2016 at 3:42:58 PM EST
To: Clare Bronfman <[REDACTED]>
Cc: Matt Burbach <[REDACTED]>

Great-

Looping in Clare here.

Clare - let us know if you want to discuss the options. The more safeguards we place on the gift, the more scrutiny we will face from USCIS. This iteration is essentially a straight transfer.

JS

----- Forwarded message -----

From: Matt Burbach <[REDACTED]>
Date: Wed, Dec 21, 2016 at 7:46 PM
Subject: Notice of Gift
To: John Sandweg <[REDACTED]>

John,

Attached please find a draft Notice of Gift, from Keith Raniere to [REDACTED] We need a few more items of information to complete, but this is pretty straightforward. This does not require a particular use of the funds, but as discussed we run risks of disapproval by CIS if we draft it as a gift and prescribe the use of funds.

That said, let's think about whether we want to draw up a two-step process – we prepare the gift documents and an escrow agreement. The gift is wired to [REDACTED] and the parties sign the Notice of Gift at the same time that [REDACTED], EB-5 Fund and Escrow Agent sign an escrow agreement providing that the funds are to be deposited into [REDACTED]'s account and then into the escrow.

Alternative #2, we provide an escrow into which Keith deposits the funds now and upon identifying an EB-5 project, the funds are released by Keith to [REDACTED] as a gift.

Matt

Matthew C. Burbach
Burbach Law LLC
[REDACTED]

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John Sandweg
[REDACTED]

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